

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION

THOMAS CIENIEWICZ,

Plaintiff,

v.

GHAFOURPOUR, DDS, ET AL.,

Defendants.

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Civil Action No: 1:22cv172

MOTION TO DISMISS

COMES NOW Defendants Wellpath, LLC, Alex Taylor, MD and Kourosh Ghafourpour DDS, by counsel, and for the reasons stated in the attached Brief, requests that this Court dismiss the claims against them in the Complaint.

Respectfully submitted,

WELLPATH, LLC,
ALEX TAYLOR, MD
And
DR. GHAFOURPOUR, DDS

/s/ Angela Boice Axselle

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CERTIFICATE

I hereby certify that on this 4th day of August, 2022, I filed the foregoing *Motion to Dismiss* electronically with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following:

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Counsel for Defendant Sgt. David Elliott

And I hereby certify that I have mailed this document by UPS Ground to the following non-filing user:

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**Counsel for Defendants Wellpath, LLC,
Alex Taylor, MD and Dr. Ghafourpour, DDS**